

EXHIBIT 1
TRANS UNION, LLC'S AMENDED
FIRST SET OF REQUESTS FOR
ADMISSION TO PLAINTIFF WITH
COVER LETTER DATED
MAY 16, 2018



4545 Northwestern Drive | Zionsville, IN 46077
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May 16, 2018

VIA REGULAR AND CERTIFIED MAIL
Return Receipt Requested

Sandra Jeanne Rancourt
9083 Dennings Road
Jonesville, MI 49250

RE: *Sandra Jeanne Rancourt v. Trans Union, LLC, et al.*
U.S. District Court, Western District of Michigan
Case No.: 1:18-cv-00042-JTN-ESC

Dear Ms. Rancourt:

In light of the Court's Case Management Order [Doc. No. 41] limiting the permitted number of Requests for Admission, enclosed please find Trans Union, LLC's Amended First Set Of Requests For Admission To Plaintiff. Please disregard the previously served First Set Of Requests For Admission To Plaintiff.

If you would like electronic copies of the above sent to you via e-mail, please contact my assistant, Terri Hargis, at thargis@schuckitlaw.com.

Very truly yours,

SCHUCKIT & ASSOCIATES, P.C.

A handwritten signature in dark ink, appearing to read 'J. Policchio', with a long horizontal flourish extending to the right.

James L. Policchio

CAF/tmh
Enclosures

cc: Sidney L. Frank, Esq. (w/encs.)
Tamara E. Fraser, Esq. (w/encs.)
Jordan S. Bolton, Esq. (w/encs.)
Kendall W. Carter, Esq. (w/encs.)

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

SANDRA JEANNE RANCOURT,
Plaintiff,

vs.

CASE NO. 1:18-cv-00042-JTN-ESC

Judge Janet T. Neff
Magistrate Judge Ellen S. Carmody

EXPERIAN INFORMATION
SOLUTIONS, INC.; TRANS
UNION, LLC; EQUIFAX, INC.;
and EQUIFAX INFORMATION
SERVICES, LLC;
Defendants.

TRANS UNION, LLC'S
AMENDED FIRST SET OF REQUESTS FOR ADMISSION TO PLAINTIFF

Defendant Trans Union, LLC ("Trans Union"), by counsel, tenders the following Amended First Set Of Requests For Admission To Plaintiff (the "Requests"), pursuant to Rule 36 of the Federal Rules of Civil Procedure. You are required to answer these Requests fully and without evasion, under oath and within thirty (30) days service, or they are deemed admitted.

TERMS AND DEFINITIONS

As used in this Request, the following terms shall have the meaning(s) set forth below:

1. "Plaintiff," "you" and "yours" are defined as Sandra Jeanne Rancourt and Plaintiff's attorney of record, any of Plaintiff's present or former agents, employees, attorneys, representatives, and any other person or entity purporting to act on Plaintiff's behalf.

2. "Defendant" or "Trans Union" means Trans Union, LLC and its attorney(s) of record, its parents, subsidiaries, any entity with which it is affiliated or any of its present or former administrators, directors, officers, employees, agents, attorneys, representatives and any other person or entity acting or purporting to act on its behalf.

3. **“Complaint”** is defined as Plaintiff’s most recently filed Original, Supplemental or Amended Complaint.

4. **“Person”** is defined as any individual, corporation, partnership, joint venture, firm, association, proprietorship, agency, board, authority, commission or other such entity.

5. **“Communicate”** and **“Communication”** are defined as (1) every manner or means of disclosure, transfer, or exchange of information, and (2) every disclosure, transfer or exchange of information, whether made or accomplished orally or by document, whether face-to-face, by telephone, mail, telex, facsimile, personal delivery, electronic mail (e-mail) or otherwise.

6. **“Document”** means any tangible object or electronic data in any form or format whatsoever from which intelligence can be perceived.

7. **“Relate to”** and **“relating to”** mean having any possible connection within the broadest sense of those terms.

8. **“And”** means and/or and **“or”** means and/or.

9. **“Including”** is defined as “including but not limited to.”

10. **“Employee”** is defined as any person who at any time during the time period covered by a request acted or purported to act on Plaintiff’s behalf, including all past and present directors, officers, executives, agents, servants, representatives, attorneys, accountants, independent contractors, advisors, or consultants of such other person(s).

11. **“State,” “identify”** and **“detail”** mean to describe fully and with specificity each and every item of information and reasoning which explains the answer to be given including, but not limited to, identification of all documents and persons relating to or referring thereto; and identification of all communications and dates on the subject; and a statement of the dates and

substance of all acts or events relating in any way to the subject matter of the Request or Interrogatory.

12. The use of the singular shall be deemed to include the plural, and the masculine and the feminine, as appropriate in the context.

13. Every reference to a company encompasses the officers, directors, agents, servants, employees, attorneys, or representative of the company.

REQUESTS FOR ADMISSION

Request No. 1: Admit that you are not aware of and have no evidence that any Trans Union employee ever misrepresented anything to or concealed anything from you.

RESPONSE:

Request No. 2: Admit that you have never had any written or oral communications with anyone at Trans Union.

RESPONSE:

Request No. 3: Admit that no one at Trans Union made a false statement to you.

RESPONSE:

Request No. 4: Admit that you have not been examined, treated, or incurred any expenses in connection with examination or treatment by a medical doctor, medical professional, psychologist, psychiatrist, mental health professional, spiritual advisor or counselor as a result of the events which form the basis of this litigation.

RESPONSE:

Request No. 5: Admit that you were not damaged, including out-of-pocket losses, or are suffering any emotional distress, humiliation, embarrassment or mental anguish as a result of any act or omission on the part of Trans Union.

RESPONSE:

Request No. 6: Admit you took no actions to mitigate the damages you claim, including but not limited to those you claim were caused by Trans Union.

RESPONSE:

Request No. 7: Admit that Trans Union's reinvestigation(s) of your dispute(s) regarding the information Trans Union reported with respect to you were reasonable.

RESPONSE:

Request No. 8: Admit that Trans Union did not knowingly, recklessly and/or intentionally commit any act or omission in conscious disregard for your rights.

RESPONSE:

Request No. 9: Admit that Trans Union did not withhold any information from you that it was required to provide you pursuant to Section 1681g of the Fair Credit Reporting Act.

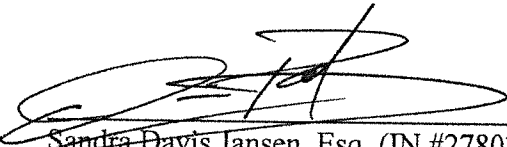
RESPONSE:

Request No. 10: Admit that the “TransUnion Personal Credit Reports” you received from Trans Union fully complied with the requirements of Section 1681g of the Fair Credit Reporting Act.

RESPONSE:

Date: May 16, 2018

Respectfully submitted,



Sandra Davis Jansen, Esq. (IN #27803-53)

Scott E. Brady, Esq. (IN #30534-49)

James L. Policchio, Esq. (IN #34737-49)

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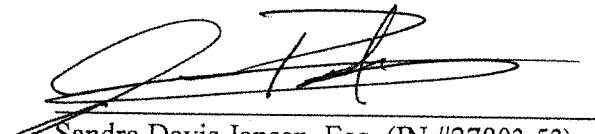
E-Mail: jpolicchio@schuckitlaw.com

Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been deposited into the United States mail, first class, properly addressed as follows, this 16th day of May, 2018:

<u>Pro Se Plaintiff</u> Sandra Jeanne Rancourt 9083 Dennings Road Jonesville, MI 49250	<u>for Defendant Experian Information Solutions, Inc.</u> Sidney L. Frank, Esq. Frank Haron Weiner & Navarro PLC 5435 Corporate Drive, Suite 225 Troy, MI 48098 Tamara E. Fraser, Esq. Williams Williams Rattner & Plunkett PC 380 N. Old Woodward Avenue, Suite 300 Birmingham, MI 48009
<u>for Defendant Equifax, Inc.</u> Jordan S. Bolton, Esq. Clark Hill PLC 500 Woodward Avenue, Suite 3500 Detroit, MI 4822-3435 Kendall W. Carter, Esq. King & Spalding LLP 1180 Peachtree Street Atlanta, GA 30309	


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